

b. Rhino sometimes called in trades directly to Frankel & Co. to be picked up by Canaccord, Dundy, or Westminster. Rhino's contact was Cody Corubia. These communications occurred regularly but Rhino is not sure of the dates because it does not have a record of the executing broker and no direct phone records.

c. The contact information for Frankel & Co. is:

30 Montgomery Street

Jersey City, NJ 07302

212-943-6633

d. No agreements exist between Rhino and Frankel & Co.

13 Hornblower and Fisher Company

Rhino has no information regarding this entity.

14 Ladenburg Thalman ("Ladenburg")

a. Ladenburg is hired by companies looking for financing. On occasion, Ladenburg has presented Rhino's clients with financing opportunities.

b. There were numerous telephone calls, meetings, and facsimiles regarding financing transactions proposed by Ladenburg, and the negotiation of various financing transactions for Amro, Creon, and their SPVs. The principal contacts at Ladenburg were as follows: James Cappuccio, Noam Rubinstein, Joseph Smith, Edward Tsuker and Michael Vasinkevich. Written communications with Ladenburg are included in the documents produced by Rhino pursuant to the Subpoena. See documents bates stamped R 5470 to R 21464 and Rhino's files.

c. The contact information for Ladenburg is:

590 Madison Avenue

New York, NY 10022

212.409.2000

800.523.8425

- d. No agreements exist between Ladenburg and Rhino.

15 Olympia Partners

Rhino has no information regarding this entity.

16 John O'Shea ("O'Shea")

a. O'Shea is a principal at Westminster. Rhino's relationship with Westminster is described in Answer No. 22 to Question 14 below.

b. Communication with Westminster occurred daily via phone, facsimile, and e-mail regarding trades for Rhino's clients. Written communications with Westminster are included in the documents produced by Rhino pursuant to the Subpoena.

- c. The contact information for O'Shea is:

Westminster Securities Corporation

100 Park Avenue

28th Floor

New York, N.Y. 10017

Tel: 1-800-553-6428

Facsimile: 212-376-8730

- d. There are no agreements between Rhino and O'Shea.

17 Pershing Division of DLJ ("Pershing")

- a. Pershing is a clearing house through which Westminster clears.

- b. Rhino has not located any direct communications with Pershing.
- c. The contact information for Pershing is:

One Pershing Plaza

Jersey City, NJ 07399

- d. There are no agreements between Pershing and Rhino. There is a Margin Agreement between Pershing and Amro, Rhino's Client. There are also Margin Agreements between Pershing and each of Radyr Investments Ltd. and Creon Management S.A.

18 Pond Equities LLC

Rhino has no information regarding this entity.

19 Refco Securities ("Refco")

- a. Refco is a brokerage house at which there are two trading accounts belonging to Amro. Contacts at Refco were Stacy Ellis, Barbara Johnston, Drillman and Spinner.
- b. Refco communicated by telephone concerning trading orders and by mail and facsimile for account statements.
- c. The contact information for Refco is:

Refco Group Ltd. LLC

One World Financial Center

200 Liberty Street Tower A

New York, NY 10281

Tel: 212-693-7000

- d. There are no agreements between Rhino and Refco. There are account opening agreements and trading authorizations between Refco and Amro, Rhino's client.

20 Sedona Corporation

- a. See Answer to Question No. 12.

b. See Answer to Question No. 12. In addition, communication occurred between Rhino and the following individuals: William Williams, Marco Emerich, and Michael Mulshine.

c. The contact information for Sedona is:

455 South Gulph Road, Suite 300
King of Prussia, PA 19406-9564
Tel: 1-800-815-3307

d. See Answer to Question No. 12.

21 Jacob Spinner

a. Spinner is a trader at Refco. See Answer 19 to Question 14.

b. Communication regarding trading occurred via telephone, and in certain instances, via facsimile.

c. The contact information for Spinner is:

Refco Group Ltd. LLC
One World Financial Center
200 Liberty Street Tower A
New York, NY 10281
Tel: 212-693-7000

d. There are no agreements between Rhino and Spinner.

22 Westminster

a. Westminster is a brokerage house at which there are several trading accounts belonging to Rhino, Amro and Creon and the following SPVs: Albans Investments, Apriori Investments Limited, Battlecreek Investments Ltd., BNC Bach International Inc., Brewers Bay Holdings Ltd., Cambois Finance Inc., Castlebar Enterprises Ltd., Cockfield Holdings Ltd., Cody Holdings Inc., Copira Investments, Coriander Enterprises Ltd., Coxton Ltd., Creon Mgmt SA,

Euston Investments Ltd., Evertrend Holdings Ltd., Fabletech Enterprises Ltd., Fibertech Holdings Ltd., Folkinburg Investments Ltd., Gestrow Investments Ltd., Helenville Holdings Ltd., Hillgreen Investments Ltd., Hockbury Limited, Impany Investments Ltd, Investwell Investments Ltd., Ironhead Investments Inc., Jadesburg Ltd., Jashell Investments Ltd., Jaspas Investments Ltd., Justicia Holdings, Karencove Ltd., Kedrick Investments Ltd., Kinesis Investments Ltd., Lamothe Investing, Mabecrown Inc., Majorlink Holdings, Maranatha Holdings Ltd., Milestone Development, Moldbury Holdings, Morganfield Investments, Mothlake International Ltd., Palmar Enterprises Ltd., Paul Revere Capital, Plumrose Holdings Ltd., Radyr Group Investments Ltd., Rellian Investments Ltd., Rhossili Investments Ltd., Roseworth Group Ltd., Sabalon Investments Limited, Sativum Investments Ltd., Scaffold International Ltd., Scottmark Enterprises Inc., Seacrown Ltd., Sibson Holdings, Splendid Rock Holdings Ltd., St. Annes Investments Ltd., Suarez Enterprises Ltd., Sugarplum Investment, Sundowner Investments Ltd, Tashdale Ltd., Techrich International Ltd., Thumberland Ltd., Townsbury Investments Ltd., Tradersbloom Ltd., Treadstone Investments, Villabeach Investments Ltd., Wanquay Ltd., Whitsend Investments Ltd., Wishmasters Ltd.

The account manager at Westminster was O'Shea. Other contacts included Sean Britton, Rick Di Gilio, Angelique Xirouhakis, Michael Dowling, and Marika Xirouhakis. Rhino received account statements on behalf of the designated entities.

b. Westminster communicated by telephone concerning trading orders and by facsimile and mail for account statements and sweeps. Written communications with Westminster are included in the documents produced by Rhino pursuant to the Subpoena. See documents bates stamped R 21496 to R 21516 and in Rhino's files.

c. The contact information for Westminster is:

Westminster Securities Corporation

100 Wall Street

7th Floor

New York, N.Y. 10005

Tel: 1-800-553-6428

Facsimile: 212-878-6599

4. There are account opening and trading authorizations agreements.

23 Wexford Clearing

Rhino has no information regarding this entity.

Question No. 15

Identify all documents concerning each financing agreement (including any convertible debenture, warrant or other instrument conveying stock purchase or acquisition rights) to which Sedona is a party including, but not limited to, conversion notices, correspondence, e mails and notes. Identify the location of the documents and if they are in Rhino's possession, custody or control.

Answer No. 15

Such documents have been produced pursuant to the Subpoena, and can be found at documents bates stamped R 13510 to R 15711. See Answer to Question No. 12.

Question No. 16

Explain in detail the strategies, if any, that Rhino utilized in trading the stock of Sedona from November 1, 2000 to the present for retail accounts in the name of Amro or Creon or over which Rhino or its principals exercised trading authority or control, including, but not limited to, the rationale for the price and timing of each trade, and the reason why each trade was made with a specific contra party.

Answer No. 16

See Answer to Questions No. 1 and No. 12.

Question No. 17

From January 1, 1999 to the present, identify all of the "investment banks and financial institutions" with which Rhino has worked as stated on Rhino's Web site. For each entity identified, identify (1) when and how Rhino's relationship began with the entity; (2) the name, address, telephone number and e mail address for Rhino's principal contact at the entity; (3) the identities of all individuals associated with each of these entities with which Rhino has had communications of any kind; (4) each financing transaction in which the entity participated; and all compensation in any form whatsoever received by Rhino from the entity.

Answer No. 17

It is my understanding that Rhino began to develop a website that was never completed and was never accessible by the general public. Rhino does not have a formal banking relationship with any investment banks, however, Rhino learns from investment banking firms and other intermediaries of companies in need of financing. These firms are as follows: U.S. Bancorp Piper Jaffray, Adams Harkness, AG Edwards, American Capital Strategies, Bank of America, Brean Murray, Cardinal Capital, CIBC, Credit Lyonnaise, Davenport & Co., DP Securities Inc., Fahnestock & Co., Falcon Consulting Company, Friedman Billings Ramsey, GKN Securities, Grady Hatch & Co., Granite Financial, Gruntal & Co., HC Wainwright, Intellect Capital, Jesup & Lamont Securities, JP Morgan, Keating Investments, LLC, Ladenburg Thallmann & Co. Inc., Lehman Brothers, LH Financial, Libra Finance, Millennium Capital, Montrose Capital Management, Morgan Keegan, Needham & Company, Pacific Crest Securities, Roth Capital Partners, Settondown Capital International, Ltd., Shoreline Pacific, Trinity Capital Advisors, Inc., Union Atlantic, LC, Westminster Securities, and William Blair & Company. Rhino has not received compensation from any of these entities.

Question No. 18

Identify all persons or entities that prepared or assisted in the preparation of the drafting of the information contained at the Web sites www.rhinoadvisors.com and www.lyrical.co.uk/Rhino concerning Rhino and its services. Provide the date the information first appeared on the Web sites and whether the information has changed. If the information has

changed, describe in detail when and how it has changed. As to each individual identified, provide the following contact information: home and business addresses; home, business, pager, and cellular telephone numbers; facsimile numbers (home and business); and electronic mail addresses. As to each entity identified, provide address and telephone number.

Answer No. 18

A website for Rhino was in the process of being created by Lyrical Computing Ltd. This website was never finalized and was not accessible by the general public. Thomas Badian and Andreas Badian participated in the preparation of the website.

Question No. 19

Identify all persons or entities that are or have ever been investors in, shareholders of, partners in or owners of Amro International S.A. or Creon Management.

Answer No. 19

The sole shareholder of Creon is Neil Galloway. That conclusion is based on an e-mail dated 7/9/01 from Arlene de Castro, assistant secretary of Beacon. The shareholders of Amro are Pablo J. Espino and Adelina M. de Estribi.

Question No. 20

State the total dollar amount of all of the financing or similar agreements that Rhino has arranged on behalf or for the benefit of Amro.

Answer No. 20

The total dollar amount of all the financings or similar agreements for which Rhino represented Amro is \$136,469,937.

Question No. 21

State the total dollar amount that Amro has received as a result of financing or similar agreements that Rhino has arranged on behalf of Amro, including, but not limited to, cash received from debentures and profit from the purchase and sale of stock.

Answer No. 21

The total dollar amount that Amro has received as a result of financing or similar agreements for which Rhino advised Amro, including, but not limited to, cash received from debentures and profit from the purchase and sale of stock is \$142,547,022 (not including unconverted principal amounts of debentures or unsold shares.)

Question No. 22

Identify Rhino's Internet service provider and the e-mail address and any screen name for each of Rhino's employees, officers and principals.

Answer No. 22

Eureka GGN is Rhino's Internet service provider. The e-mail address and screen name for each of Rhino's employees, officers and principals is as follows:

Andreas Badian - abadian@rhinoadvisors.com and andreas0@aol.com

Thomas Badian - tbadian@rhinoadvisors.com and tbadian@aol.com

Rosa Alaimo - ralaimo@rhinoadvisors.com

Alex Liesegang - aliesegang@rhinoadvisors.com

Richard Austin - raustin@rhinoadvisors.com

Stefan P. Siegal - spsiegal@rhinoadvisors.com

Question No. 23

Identify Rhino's past and current local, wireless and long distance telephone carriers that Rhino and its officers and employees use in conducting business for or on behalf of Rhino, and all business phone numbers that Rhino and its officers and employees use in conducting business for or on behalf of Rhino.

Answer No. 23

Eureka GGN (formerly known as the Gillette Global Network): Local and long distance	Verizon (formerly known as Bell Atlantic): Local	Sprint PCS wireless service:	VoiceStream wireless service:	AT&T Wireless:
212-594-4359	212-594-7760	646-245-5355	917-403-9575	917-679-2624
212-594-4361	212-594-6555	646-489-1623		917-742-7020
212-594-4471		917-447-8162		917-860-4430
212-594-6227				917-951-8112
212-594-6228				917-603-2636 (in the name of Stefan P. Siegal)
212-594-6298				
212-594-6555				
212-594-7181				
212-594-7424				
212-594-7425				
212-594-7489				
212-594-7785				



ROBERT F. CHARRON

Sworn to before me this
17th day of July, 2003



Notary Public

ADAM MMELES
NOTARY PUBLIC, State of New York
No. 02M16019846
Qualified in New York County
Commission Expires Feb. 18, 2007